

BEFORE THE
BOARD OF REGISTERED NURSING
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Statement of Issues Against:

CHIANTE CHALON JONES

Applicant for Registered Nurse License

Respondent

Case No. 2012 – 248

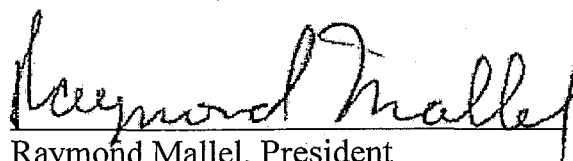
OAH No. L-2011120752

DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary Order is hereby adopted by the Board of Registered Nursing, Department of Consumer Affairs, as its Decision in the above entitled matter.

This Decision shall become effective on **October 11, 2012**.

IT IS SO ORDERED **September 11, 2012**.



Raymond Mallel, President
Board of Registered Nursing
Department of Consumer Affairs
State of California

1 KAMALA D. HARRIS
Attorney General of California
2 GLORIA A. BARRIOS
Supervising Deputy Attorney General
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Attorneys for Complainant.

7
8 **BEFORE THE**
BOARD OF REGISTERED NURSING
DEPARTMENT OF CONSUMER AFFAIRS
9 **STATE OF CALIFORNIA**

10 In the Matter of the Statement of Issues
11 Against:

12 **CHIANTE CHALON JONES**
1401 E. Santo Antonio Drive, #364
13 Colton, CA 92324
Applicant for Registered Nurse License

14 Respondent.

Case No. 2012-248.

OAH No. L-2011120752
STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER

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18 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-
19 entitled proceedings that the following matters are true:

20
21 **PARTIES**

22 1. Louise R. Bailey, M.Ed., RN (Complainant) is the Interim Executive Officer of the
23 Board of Registered Nursing. She brought this action solely in her official capacity and is
24 represented in this matter by Kamala D. Harris, Attorney General of the State of California, by
25 Langston M. Edwards, Deputy Attorney General.

26 2. Respondent Chiante Chalon Jones (Respondent) is represented in this proceeding by
27 attorney Rajan R. Maline, whose address is:
28

1 Law Offices of Rajan Maline
2 3750 University Ave., Suite 680
3 Riverside, CA 92501

4 3. On or about February 16, 2011, Respondent filed an application dated January 29,
5 2011, with the Board of Registered Nursing to obtain a Registered Nurse License.

6
7 **JURISDICTION**

8 4. Statement of Issues No. 2012-248 was filed before the Board of Registered Nursing
9 (Board), Department of Consumer Affairs, and is currently pending against Respondent. The
10 Statement of Issues and all other statutorily required documents were properly served on
11 Respondent on October 26, 2011.

12 5. A copy of Statement of Issues No. 2012-248 is attached as **Exhibit A** and
13 incorporated herein by reference.

14
15 **ADVISEMENT AND WAIVERS**

16 6. Respondent has carefully read, fully discussed with counsel, and understands the
17 charges and allegations in Statement of Issues No. 2012-248. Respondent has also carefully read,
18 fully discussed with counsel, and understands the effects of this Stipulated Settlement and
19 Disciplinary Order.

20 7. Respondent is fully aware of her legal rights in this matter, including the right to a
21 hearing on the charges and allegations in the Statement of Issues; the right to be represented by
22 counsel at her own expense; the right to confront and cross-examine the witnesses against her; the
23 right to present evidence and to testify on her own behalf; the right to the issuance of subpoenas
24 to compel the attendance of witnesses and the production of documents; the right to
25 reconsideration and court review of an adverse decision; and all other rights accorded by the
26 California Administrative Procedure Act and other applicable laws.

27 8. Respondent voluntarily, knowingly, and intelligently waives and gives up each and
28 every right set forth above.

1 **CULPABILITY**

2 9. Respondent admits the truth of each and every charge and allegation in Statement of
3 Issues No. 2012-248.

4 10. Respondent agrees that her Applicant for Registered Nurse License is subject to
5 denial and she agrees to be bound by the Board's probationary terms as set forth in the
6 Disciplinary Order below.

7
8 **CONTINGENCY**

9 11. This stipulation shall be subject to approval by the Board of Registered Nursing.
10 Respondent understands and agrees that counsel for Complainant and the staff of the Board of
11 Registered Nursing may communicate directly with the Board regarding this stipulation and
12 settlement, without notice to or participation by Respondent or her counsel. By signing the
13 stipulation, Respondent understands and agrees that she may not withdraw her agreement or seek
14 to rescind the stipulation prior to the time the Board considers and acts upon it. If the Board fails
15 to adopt this stipulation as its Decision and Order, the Stipulated Settlement and Disciplinary
16 Order shall be of no force or effect, except for this paragraph, it shall be inadmissible in any legal
17 action between the parties, and the Board shall not be disqualified from further action by having
18 considered this matter.

19 12. The parties understand and agree that facsimile copies of this Stipulated Settlement
20 and Disciplinary Order, including facsimile signatures thereto, shall have the same force and
21 effect as the originals.

22 13. This Stipulated Settlement and Disciplinary Order is intended by the parties to be an
23 integrated writing representing the complete, final, and exclusive embodiment of their agreement.
24 It supersedes any and all prior or contemporaneous agreements, understandings, discussions,
25 negotiations, and commitments (written or oral). This Stipulated Settlement and Disciplinary
26 Order may not be altered, amended, modified, supplemented, or otherwise changed except by a
27 writing executed by an authorized representative of each of the parties.
28

14. In consideration of the foregoing admissions and stipulations, the parties agree that the Board may, without further notice or formal proceeding, issue and enter the following Disciplinary Order:

DISCIPLINARY ORDER

IT IS HEREBY ORDERED

1. The application of Respondent Chiante Chalon Jones for licensure is hereby granted. Upon successful completion of the licensure examination and all other licensing requirements, a license shall be issued to Respondent. Said license shall immediately be revoked, the order of revocation stayed and Respondent placed on probation for a period of two (2) years on the following conditions:

Severability Clause. Each condition of probation contained herein is a separate and distinct condition. If any condition of this Order, or any application thereof, is declared unenforceable in whole, in part, or to any extent, the remainder of this Order, and all other applications thereof, shall not be affected. Each condition of this Order shall separately be valid and enforceable to the fullest extent permitted by law.

1. **Obey All Laws.** Respondent shall obey all federal, state and local laws. A full and detailed account of any and all violations of law shall be reported by Respondent to the Board in writing within seventy-two (72) hours of occurrence. To permit monitoring of compliance with this condition, Respondent shall submit completed fingerprint forms and fingerprint fees within 45 days of the effective date of the decision, unless previously submitted as part of the licensure application process.

Criminal Court Orders: If Respondent is under criminal court orders, including probation or parole, and the order is violated, this shall be deemed a violation of these probation conditions, and may result in the filing of an accusation and/or petition to revoke probation.

2. **Comply with the Board's Probation Program.** Respondent shall fully comply with the conditions of the Probation Program established by the Board and cooperate with

1 representatives of the Board in its monitoring and investigation of the Respondent's compliance
2 with the Board's Probation Program. Respondent shall inform the Board in writing within no
3 more than 15 days of any address change and shall at all times maintain an active, current license
4 status with the Board, including during any period of suspension.

5 Upon successful completion of probation, Respondent's license shall be fully restored.

6 3. **Report in Person.** Respondent, during the period of probation, shall appear in
7 person at interviews/meetings as directed by the Board or its designated representatives.

8 4. **Residency, Practice, or Licensure Outside of State.** Periods of residency or
9 practice as a registered nurse outside of California shall not apply toward a reduction of this
10 probation time period. Respondent's probation is tolled, if and when she resides outside of
11 California. Respondent must provide written notice to the Board within 15 days of any change of
12 residency or practice outside the state, and within 30 days prior to re-establishing residency or
13 returning to practice in this state.

14 Respondent shall provide a list of all states and territories where she has ever been licensed
15 as a registered nurse, vocational nurse, or practical nurse. Respondent shall further provide
16 information regarding the status of each license and any changes in such license status during the
17 term of probation. Respondent shall inform the Board if she applies for or obtains a new nursing
18 license during the term of probation.

19 5. **Submit Written Reports.** Respondent, during the period of probation, shall submit
20 or cause to be submitted such written reports/declarations and verification of actions under
21 penalty of perjury, as required by the Board. These reports/declarations shall contain statements
22 relative to Respondent's compliance with all the conditions of the Board's Probation Program.
23 Respondent shall immediately execute all release of information forms as may be required by the
24 Board or its representatives.

25 Respondent shall provide a copy of this Decision to the nursing regulatory agency in every
26 state and territory in which she has a registered nurse license.

27 6. **Function as a Registered Nurse.** Respondent, during the period of probation, shall
28 engage in the practice of registered nursing in California for a minimum of 24 hours per week for

1 6 consecutive months or as determined by the Board.

2 For purposes of compliance with the section, "engage in the practice of registered nursing"
3 may include, when approved by the Board, volunteer work as a registered nurse, or work in any
4 non-direct patient care position that requires licensure as a registered nurse.

5 The Board may require that advanced practice nurses engage in advanced practice nursing
6 for a minimum of 24 hours per week for 6 consecutive months or as determined by the Board.

7 If Respondent has not complied with this condition during the probationary term, and
8 Respondent has presented sufficient documentation of her good faith efforts to comply with this
9 condition, and if no other conditions have been violated, the Board, in its discretion, may grant an
10 extension of Respondent's probation period up to one year without further hearing in order to
11 comply with this condition. During the one year extension, all original conditions of probation
12 shall apply.

13 **7. Employment Approval and Reporting Requirements.** Respondent shall obtain
14 prior approval from the Board before commencing or continuing any employment, paid or
15 voluntary, as a registered nurse. Respondent shall cause to be submitted to the Board all
16 performance evaluations and other employment related reports as a registered nurse upon request
17 of the Board.

18 Respondent shall provide a copy of this Decision to her employer and immediate
19 supervisors prior to commencement of any nursing or other health care related employment.

20 In addition to the above, Respondent shall notify the Board in writing within seventy-two
21 (72) hours after she obtains any nursing or other health care related employment. Respondent
22 shall notify the Board in writing within seventy-two (72) hours after she is terminated or
23 separated, regardless of cause, from any nursing, or other health care related employment with a
24 full explanation of the circumstances surrounding the termination or separation.

25 **8. Supervision.** Respondent shall obtain prior approval from the Board regarding
26 Respondent's level of supervision and/or collaboration before commencing or continuing any
27 employment as a registered nurse, or education and training that includes patient care.

28 Respondent shall practice only under the direct supervision of a registered nurse in good

1 standing (no current discipline) with the Board of Registered Nursing, unless alternative methods
2 of supervision and/or collaboration (e.g., with an advanced practice nurse or physician) are
3 approved.

4 Respondent's level of supervision and/or collaboration may include, but is not limited to the
5 following:

6 (a) Maximum - The individual providing supervision and/or collaboration is present in
7 the patient care area or in any other work setting at all times.

8 (b) Moderate - The individual providing supervision and/or collaboration is in the patient
9 care unit or in any other work setting at least half the hours Respondent works.

10 (c) Minimum - The individual providing supervision and/or collaboration has person-to-
11 person communication with Respondent at least twice during each shift worked.

12 (d) Home Health Care - If Respondent is approved to work in the home health care
13 setting, the individual providing supervision and/or collaboration shall have person-to-person
14 communication with Respondent as required by the Board each work day. Respondent shall
15 maintain telephone or other telecommunication contact with the individual providing supervision
16 and/or collaboration as required by the Board during each work day. The individual providing
17 supervision and/or collaboration shall conduct, as required by the Board, periodic, on-site visits to
18 patients' homes visited by Respondent with or without Respondent present.

19 9. **Employment Limitations.** Respondent shall not work for a nurse's registry, in any
20 private duty position as a registered nurse, a temporary nurse placement agency, a traveling nurse,
21 or for an in-house nursing pool.

22 Respondent shall not work for a licensed home health agency as a visiting nurse unless the
23 registered nursing supervision and other protections for home visits have been approved by the
24 Board. Respondent shall not work in any other registered nursing occupation where home visits
25 are required.

26 Respondent shall not work in any health care setting as a supervisor of registered nurses.
27 The Board may additionally restrict Respondent from supervising licensed vocational nurses
28 and/or unlicensed assistive personnel on a case-by-case basis.

1 Respondent shall not work as a faculty member in an approved school of nursing or as an
2 instructor in a Board approved continuing education program.

3 Respondent shall work only on a regularly assigned, identified and predetermined
4 worksite(s) and shall not work in a float capacity.

5 If Respondent is working or intends to work in excess of 40 hours per week, the Board may
6 request documentation to determine whether there should be restrictions on the hours of work.

7 **10. Complete a Nursing Course(s).** Respondent, at her own expense, shall enroll and
8 successfully complete a course(s) relevant to the practice of registered nursing no later than six
9 months prior to the end of her probationary term.

10 Respondent shall obtain prior approval from the Board before enrolling in the course(s).
11 Respondent shall submit to the Board the original transcripts or certificates of completion for the
12 above required course(s). The Board shall return the original documents to Respondent after
13 photocopying them for its records.

14 **11. Violation of Probation.** If Respondent violates the conditions of her probation, the
15 Board after giving Respondent notice and an opportunity to be heard, may set aside the stay order
16 and impose the stayed discipline (revocation/suspension) of Respondent's license.

17 If during the period of probation, an accusation or petition to revoke probation has been
18 filed against Respondent's license or the Attorney General's Office has been requested to prepare
19 an accusation or petition to revoke probation against Respondent's license, the probationary
20 period shall automatically be extended and shall not expire until the accusation or petition has
21 been acted upon by the Board.

22 **12. License Surrender.** During Respondent's term of probation, if she ceases practicing
23 due to retirement, health reasons or is otherwise unable to satisfy the conditions of probation,
24 Respondent may surrender her license to the Board. The Board reserves the right to evaluate
25 Respondent's request and to exercise its discretion whether to grant the request, or to take any
26 other action deemed appropriate and reasonable under the circumstances, without further hearing.
27 Upon formal acceptance of the tendered license and wall certificate, Respondent will no longer be
28 subject to the conditions of probation.

1 Surrender of Respondent's license shall be considered a disciplinary action and shall
2 become a part of Respondent's license history with the Board. A registered nurse whose license
3 has been surrendered may petition the Board for reinstatement no sooner than the following
4 minimum periods from the effective date of the disciplinary decision:

5 (1) Two years for reinstatement of a license that was surrendered for any reason other
6 than a mental or physical illness; or

7 (2) One year for a license surrendered for a mental or physical illness.

8 13. **Mental Health Examination.** Respondent shall, within 45 days of the effective date
9 of this Decision, have a mental health examination including psychological testing as appropriate
10 to determine her capability to perform the duties of a registered nurse. The examination will be
11 performed by a psychiatrist, psychologist or other licensed mental health practitioner approved by
12 the Board. The examining mental health practitioner will submit a written report of that
13 assessment and recommendations to the Board. All costs are the responsibility of Respondent.
14 Recommendations for treatment, therapy or counseling made as a result of the mental health
15 examination will be instituted and followed by Respondent.

16 If Respondent is determined to be unable to practice safely as a registered nurse, the
17 licensed mental health care practitioner making this determination shall immediately notify the
18 Board and Respondent by telephone, and the Board shall request that the Attorney General's
19 office prepare an accusation or petition to revoke probation. Respondent shall immediately cease
20 practice and may not resume practice until notified by the Board. During this period of
21 suspension, Respondent shall not engage in any practice for which a license issued by the Board
22 is required, until the Board has notified Respondent that a mental health determination permits
23 Respondent to resume practice. This period of suspension will not apply to the reduction of this
24 probationary time period.

25 If Respondent fails to have the above assessment submitted to the Board within the 45-day
26 requirement, Respondent shall immediately cease practice and shall not resume practice until
27 notified by the Board. This period of suspension will not apply to the reduction of this
28 probationary time period. The Board may waive or postpone this suspension only if significant,

1 documented evidence of mitigation is provided. Such evidence must establish good faith efforts
2 by Respondent to obtain the assessment, and a specific date for compliance must be provided.
3 Only one such waiver or extension may be permitted.

4 14. **Therapy or Counseling Program.** Respondent, at her expense, shall participate in
5 an on-going counseling program until such time as the Board releases her from this requirement
6 and only upon the recommendation of the counselor. Written progress reports from the counselor
7 will be required at various intervals.

8
9 ACCEPTANCE

10 I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully
11 discussed it with my attorney, Rajan R. Maline. I understand the stipulation and the effect it will
12 have on my Applicant for Registered Nurse License. I enter into this Stipulated Settlement and
13 Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be bound by the
14 Decision and Order of the Board of Registered Nursing.

15
16 DATED: 6/21/12

Chianti Jones
CHIANTE CHALON JONES
Respondent

17
18
19 I have read and fully discussed with Respondent Chianti Chalon Jones the terms and
20 conditions and other matters contained in the above Stipulated Settlement and Disciplinary Order.
21 I approve its form and content.

22 DATED: 6.21.12

Rajan R. Maline
Rajan R. Maline
Attorney for Respondent

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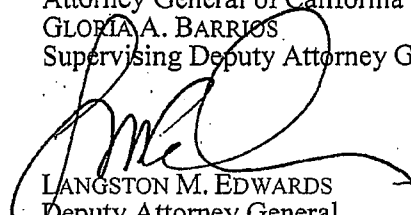
ENDORSEMENT

The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully submitted for consideration by the Board of Registered Nursing of the Department of Consumer Affairs.

Dated:

Respectfully submitted,

KAMALA D. HARRIS
Attorney General of California
GLORIA A. BARRIOS
Supervising Deputy Attorney General



LANGSTON M. EDWARDS
Deputy Attorney General
Attorneys for Complainant

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Exhibit A

Statement of Issues No. 2012-248

1 KAMALA D. HARRIS
Attorney General of California
2 MARC D. GREENBAUM
Supervising Deputy Attorney General
3 LANGSTON M. EDWARDS
Deputy Attorney General
4 State Bar No. 237926
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5 Los Angeles, CA 90013
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6 Facsimile: (213) 897-2804
Attorneys for Complainant
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8 **BEFORE THE**
BOARD OF REGISTERED NURSING
9 **DEPARTMENT OF CONSUMER AFFAIRS**
10 **STATE OF CALIFORNIA**

11 In the Matter of the Statement of Issues
Against:

Case No. **2012-248**

12 **CHIANTE CHALON JONES**
13 1401 E. Santo Antonio Drive, #364
14 Colton, CA 92324

STATEMENT OF ISSUES

15 Applicant for Registered Nurse License

16 Respondent.

17
18 Complainant alleges:

19 **PARTIES**

20 1. Louise R. Bailey, M.Ed., RN (Complainant) brings this Statement of Issues solely in
21 her official capacity as the Executive Officer of the Board of Registered Nursing, Department of
22 Consumer Affairs (Board).

23 2. On or about February 16, 2011, the Board received an application for a Registered
24 Nurse License from Chiante Chalon Jones (Respondent). On or about January 29, 2011, Chiante
25 Chalon Jones certified under penalty of perjury to the truthfulness of all statements, answers, and
26 representations in the application. The Board denied the application on May 31, 2011.

27 ///

28 ///

1 United States, by any other government agency, or by another California health care professional
2 licensing board. A certified copy of the decision or judgment shall be conclusive evidence of that
3 action.

4

5 (f) Conviction of a felony or of any offense substantially related to the qualifications,
6 functions, and duties of a registered nurse, in which event the record of the conviction shall be
7 conclusive evidence thereof."

8
9 **REGULATORY PROVISION**

10 6. California Code of Regulations, title 16, section 1444 states, in pertinent part:

11 "A conviction or act shall be considered to be substantially related to the qualifications,
12 functions or duties of a registered nurse if to a substantial degree it evidences the present or
13 potential unfitness of a registered nurse to practice in a manner consistent with the public health,
14 safety, or welfare. Such convictions or acts shall include but not be limited to the following:

15 (c) Theft, dishonesty, fraud, or deceit."

16
17 **FIRST CAUSE FOR DENIAL OF APPLICATION**

18 **(Conviction of Substantially Related Crime)**

19 7. Respondent's application is subject to denial under sections 480, subdivision (a)(1),
20 and 2761, subdivision (f), in conjunction with California Code of Regulations, title 16, section
21 1444, in that on or about June 6, 2007, Respondent was convicted of a crime substantially related
22 to the qualifications, functions or duties of a registered nurse which to a substantial degree
23 evidences her present or potential unfitness to practice in a manner consistent with the public
24 health, safety, or welfare, as follows:

25 a. On or about June 6, 2007, after pleading guilty, Respondent was convicted of a lesser
26 misdemeanor Count 16 for violating Penal Code section 487(a) [grand theft] in the criminal
27 proceeding entitled *The People of the State of California v. Chiante Chalon Jones* (Super. Ct. San
28 Bernardino County, 2007, No. FWV700200). The Court sentenced Respondent to 90 days in jail,

1 placed her on 36 months probation, and ordered her to pay \$5,000 restitution to Bank of America.
2 On or about December 11, 2007, the Court dismissed the conviction pursuant to Penal Code
3 section 1203.4.

4 b. The circumstances underlying the conviction are that sometime on or around 2007,
5 Respondent opened four (4) bank accounts at Wells Fargo, Washington Mutual and Bank of
6 America and Citibank. Then, during the time period on or around January 31, 2007, through on
7 or about February 7, 2007, Respondent's boyfriend, E.H., deposited through wire transfers, two
8 (2) large sums of money into Respondent's Wells Fargo account in the amounts of \$23,000.00
9 and \$18,750.00, respectively. Respondent then withdrew the monies from the Wells Fargo
10 account in increments of \$5000.00 and gave the money to E.H. In exchange, E.H. paid
11 Respondent's bills including a car payment and paying off a commercial credit card. Respondent
12 also deposited two (2) checks in the amounts of \$7,000.00 and \$4,000.00, respectively, into her
13 Bank of America account at E.H.'s request. Respondent also deposited \$500.00 into a Citibank
14 account held for E.H. Pursuant to San Bernardino Sheriffs' investigation, the monies wire
15 transferred into Respondent's account and/or deposited by the Respondent were determined to
16 have originated from the banking accounts of others, without consent, by way of theft of their
17 identities and banking information.

18 19 **SECOND CAUSE FOR DENIAL OF APPLICATION**

20 **(Dishonest Acts)**

21 8. Respondent's application is subject to denial under section 480, subdivision (a)(2), in
22 that Respondent committed acts involving dishonesty, fraud, or deceit with the intent to
23 substantially benefit herself and others, and substantially injure others in that she committed acts
24 involving fraudulent theft of property. Complainant refers to and by this reference incorporates
25 the allegations set forth above in paragraph 7, subparagraphs a and b, inclusive, as though set
26 forth fully herein.

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THIRD CAUSE FOR DENIAL OF APPLICATION

(Disciplinary Action by California Board of Vocational Nursing & Psychiatric Technicians)

9. Respondent's application is subject to denial under section 2761, subdivision (a)(4), in that on or about July 25, 2007, the Board of Vocational Nursing & Psychiatric Technicians, State of California, Department of Consumer Affairs, issued Citation Number 07-0215-L with a \$500.00 fine against Respondent for violating sections 2878(a) [unprofessional conduct] and 2878(f) [conviction of a substantially related crime], in conjunction with California Code of Regulations, title 16, section 2521 [substantial relationship] as a result of her criminal conviction on or about June 6, 2006, for violating Penal Code section 487(a) [grand theft] in the proceeding entitled *People v. Jones, supra*.

FOURTH CAUSE FOR DENIAL OF APPLICATION

(Acts Constituting Grounds for Discipline if Licensed)

10. Respondent's application is subject to denial under section 480, subdivision (a)(3), in that Respondent committed substantially related acts which if done by a registered nurse would constitute cause for suspension or revocation of licensure. Complainant refers to and by this reference incorporates the allegations set forth above in paragraphs 7 – 9 and all subparagraphs inclusive, as though set forth fully herein.

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PRAYER

WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the Board of Registered Nursing issue a decision:

1. Denying Chiante Chalon Jones' application for Registered Nurse License; and
2. Taking such other and further action as deemed necessary and proper.

DATED: October 24, 2011

Louise R. Bailey
LOUISE R. BAILEY, M.ED., RN
Executive Officer
Board of Registered Nursing
Department of Consumer Affairs
State of California
Complainant

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